

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MICHAEL JONES,	)	
	)	
Plaintiff,	)	Case No. 23-cv-04975
	)	
v.	)	
	)	
CITY OF CHICAGO, et al.,	)	Honorable Judge Joan Gottschall
	)	Magistrate Judge Jeffrey Cole
Defendants.	)	

**DEFENDANTS’ UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE ITS RESPONSIVE PLEADING**

NOW COMES Defendant City of Chicago (the “City”), by and through their undersigned counsel, Nathan & Kamionski LLP, Defendant Officer David Salgado, by and through his undersigned counsel, Borkan & Scahill, Ltd., and Defendant Officers Bryan Cox, Peter Theodore, and Rocco Pruger, by and through their undersigned counsel, Mohan Groble Scolaro P.C., respectfully move this Court for entry of an order extending the time to January 24, 2025, to file its motion to dismiss Plaintiff’s Amended Complaint. In support thereof, Defendants state as follows:

1. On December 12, 2024, Plaintiff filed his Amended Complaint alleging a federal malicious prosecution claim under the Fourth Amendment, a evidence fabrication claim under the Fourth and Fourteenth Amendments, and a conspiracy claim against Defendant Officers Bryan Cox, Peter Theodore, David Salgado, and Rocco Pruger, as well as a failure to intervene claim against Defendant Officers Theodore, Salgado, and Pruger. *See* Dkt. 50. Plaintiff is also alleging a *Monell* claim and state law malicious prosecution claim against the City of Chicago. *Id.*

2. Defendants have until December 26, 2024, to file an answer or otherwise respond to Plaintiff's Amended Complaint.

3. Defendants have been diligently working to prepare each of their responsive pleadings to Plaintiff's Amended Complaint.

4. However, due to the various holidays at the end of December and travel plans by counsel for the City, Defendants require additional time to draft their respective responsive pleadings, evaluate if a motion to dismiss should be file, and to complete their review of records and information with their clients.

5. Given these circumstances, Defendants requests additional time, or until January 24, 2025, to file its responsive pleadings to Plaintiff's Amended Complaint.

6. Defendants conferred with Plaintiff's counsel by email on December 17, 2024, and Plaintiff's counsel had no objection to the extension.

7. This motion is brought in good faith and not for the purpose of causing undue delay. Moreover, no prejudice will result from the granting of this motion as no trial date has been set in this matter.

WHEREFORE Defendants respectfully requests that this Honorable Court grants its motion for an extension of time to file its responsive pleadings to Plaintiff's Amended Complaint on or by January 24, 2025.

Dated: December 19, 2024

Respectfully submitted,

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